UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

October 3, 2012

Gregory S. Punske, P.E.
District Engineer
Texas Division
Federal Highway Administration
Federal Building, Room 826
300 East 8th Street
Austin, TX 78701

Dear Mr. Punske:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Final Environmental Impact Statement (FEIS) prepared by the Federal Highway Administration (FHWA) of the United States Department of Transportation (DOT) for Grand Parkway (State Highway 99) Segment C, located in Fort Bend, Brazoria, and Galveston counties, Texas.

EPA Region 6 provided comments and rated the Draft EIS on July 26, 2000, as**"EO-2"**, i.e. EPA has Environmental Objections and Requested Additional Information. EPA is pleased that the FEIS includes additional analysis of the proposed action to address our concerns. However, we are offering additional Detailed Comments on air quality mitigation. Please provide our office with a copy of the Record of Decision (ROD) to complete the NEPA process.

EPA appreciates the opportunity to review the FEIS. If you have any questions or concerns, please contact Michael Jansky of my staff at jansky.michael@epa.gov or 214-665-7451 for assistance.

Sincerely,

Rhonda Smith
Chief, Office of Planning
and Coordination

Enclosure

DETAILED COMMENTS
ON THE
FINAL ENVIRONMENTAL IMPACT STATEMENT (FEIS)
FOR THE
FEDERAL HIGHWAY ADMINISTRATION
GRAND PARKWAY STATE HIGHWAY 99 SEGMENT C
HOUSTON, TEXAS

Air Planning

Section 3.6.1 – National Ambient Air Quality Standards (NAAQS). This section states on page 3-35 that one of the closest monitoring stations to the proposed SH 99 Segment C project area is the Clinton Drive monitor, CAMS C403. Although the Houston/Galveston/Brazoria area is currently in attainment of the PM2.5 fine particulate matter NAAQS, it should be noted that the Clinton Drive monitor is a sensitive monitor for this criteria pollutant, as exceedances of the PM2.5 NAAQS have occurred at this site. Page 4-58 of this document indicates that specific dust suppression mitigation measures to be utilized will be identified in a dust control plan prepared prior to construction. EPA supports the development of a dust control plan to reduce potential air quality impacts associated with project construction activities. The agencies responsible for the project should develop the dust control/construction emissions mitigation plan and adopt the plan in the Record of Decision (ROD). In addition to these and all applicable local, state, or federal requirements, EPA recommends that the following additional mitigation measures be included in construction emissions mitigation plans and documentation in order to reduce impacts associated with emissions of NOx, CO, PM, SO_2, and other pollutants from construction-related activities:

Fugitive Dust Source Controls:

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate at active and inactive sites during workdays, weekends, holidays, and windy conditions;
- Install wind fencing and phase grading operations where appropriate;
- Operate water trucks for stabilization of surfaces under windy conditions; and
- Prevent spillage when hauling material and operating non-earthmoving equipment. Limit speed to 15 miles per hour for non-earthmoving equipment and 10 miles per hour for earth moving equipment.

Mobile and Stationary Source Controls:

- Plan construction scheduling to minimize vehicle trips;

- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections;

- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed;

- If practicable, utilize new, clean equipment meeting the most stringent of applicable Federal or State Standards. In general, commit to the best available emissions control technology. Tier 4 engines should be used for project construction equipment to the maximum extent feasible;

- Lacking availability of non-road construction equipment that meets Tier 4 engine standards, the responsible agency should commit to using EPA-verified particulate traps, oxidation catalysts and other appropriate controls where suitable to reduce emissions of diesel particulate matter and other pollutants at the construction site; and

- Consider alternative fuels and energy sources such as natural gas and electricity (plug-in or battery).

Administrative controls:

- Prepare an inventory of all equipment prior to construction and identify the suitability of add-on emission controls for each piece of equipment before groundbreaking;

- Develop a construction traffic and parking management plan that maintains traffic flow and plan construction to minimize vehicle trips; and

- Identify sensitive receptors in the project area, such as children, elderly, and infirmed, and specify the means by which impacts to these populations will be minimized (e.g. locate construction equipment and staging zones away from sensitive receptors and building air intakes).